

EXHIBIT I

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Drew J. Ribar,
Plaintiff,

v.

State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,
Defendants.

Case No. 3:24-cv-00103-ART-CLB

EXHIBIT I – Criminal Complaint (Bates Nos. EX022–EX024)

Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P. 56)

Plaintiff Drew J. Ribar, pro se, submits Exhibit I, the Criminal Complaint filed by the Carson City District Attorney's Office on August 31, 2022, in Carson City Justice Court (Case No. 22 CR 01231 1C), obtained via discovery in the dismissed criminal case. Filed manually per LR IC 2-2 with a Notice of Manual Filing, this exhibit stands alone as evidence of Defendants' prosecutorial actions following Plaintiff's arrest on August 30, 2022, while cross-referencing Exhibits C, D, E, F, and H to support Plaintiff's claims and Rule 56 motion.

Key Evidence and Legal Violations

PLEADING TITLE - 1

Section	Incident	Legal Relevance	Cross-Reference
Count I: Trespass (Bates EX022– EX024)	Alleges Plaintiff remained on NDOC property, filming security measures , after orders to leave (NRS 207.200).	Violates First Amendment recording rights (<i>Fordyce v. Seattle</i> , 55 F.3d 436 (9th Cir. 1995); <i>Nieves v. Bartlett</i> , 139 S. Ct. 1715 (2019)); Fourth Amendment malicious prosecution (<i>Thompson v. Clark</i> , 142 S. Ct. 1332 (2022)); NRS 207.200 requires notice, absent in video evidence; supports retaliation pretext (<i>Board of County Comm'rs v. Umbehr</i> , 518 U.S. 668 (1996)).	Exhibit C, 01:01:40.583 (public road), 01:05:13.333 (no signs); Exhibit F, EX001–EX002
		Supports First Amendment retaliation	
	Alleges Plaintiff obstructed NDOC officials by refusing to stop filming , causing lockdown (NRS 199.280, shifted from NRS 197.190 in Exhibit F).	(<i>Glik v. Cunniffe</i> , 655 F.3d 78 (1st Cir. 2011); <i>Irizarry v. Yehia</i> , 38 F.4th 1282 (10th Cir. 2022)); Fourth Amendment lack of probable cause (<i>Devenpeck v. Alford</i> , 543 U.S. 146 (2004)); NRS 199.280 requires lawful order, unproven; prosecutorial shift from NRS 197.190 suggests pretext (<i>Thompson</i>).	Exhibit D, 0:20:56 (no obstruction); Exhibit F, EX001–EX002
Count II: Resist Public Officer			

Section	Incident	Legal Relevance	Cross-Reference
		Supports Fourth Amendment	
		malicious prosecution via	
	Omits NRS 203.010	inconsistent charges (<i>Thompson</i>);	Exhibit H, EX016–
Complaint	from Exhibit F, filed	Fourteenth Amendment due process	EX017 (two
Filing (Bates	within 24 hours by	violation (<i>Mathews v. Eldridge</i> , 424	charges); Exhibit
EX022-	DA Tyson Darin	U.S. 319 (1976); <i>Parratt v. Taylor</i> ,	E, 0:01:04–0:01:20
EX024)	League, ratifying	451 U.S. 527 (1981)); rapid filing and	(retaliation threats)
	arrest claims.	ratification suggest retaliatory policy	
		(<i>Monell v. Dep't of Soc. Servs.</i> , 436	
		U.S. 658 (1978)).	
		Fifth Amendment violation (<i>Miranda</i>	
Post-Arrest	Late Miranda warning	<i>v. Arizona</i> , 384 U.S. 436 (1966)),	Exhibit D, 0:20:56;
Context	ignored in prosecution	unaddressed by DA, supporting due	Exhibit F, EX017
	filing.	process claim (<i>Mathews</i>).	

Legal Claims Supported

- **First Amendment (42 U.S.C. § 1983):** Prosecution for lawful recording (*Fordyce, Glik, Irizarry, Nieves, Umbehr*; NRS 171.1233), contradicted by Exhibits C and D.
- **Fourth Amendment (42 U.S.C. § 1983):** Malicious prosecution via inconsistent charges and weak probable cause (*Thompson, Devenpeck*), tied to Exhibit F (EX001–EX002) and tow (EX014–EX015, *Soldal v. Cook County*, 506 U.S. 56 (1992)).

- 1 • **Fifth Amendment (42 U.S.C. § 1983):** Late Miranda warning (*Miranda*), unaddressed in
2 prosecution, per Exhibit D (0:20:56).
- 3 • **Fourteenth Amendment (42 U.S.C. § 1983):** Procedural due process flaws in charging
4 and prosecution (*Mathews, Parratt*); substantive economic harm to Plaintiff's towing
5 business linked to Exhibit E (*Meyer v. Nebraska*, 262 U.S. 390 (1923); *County of*
6 *Sacramento v. Lewis*, 523 U.S. 833 (1998)).
- 7 • **Municipal Liability (42 U.S.C. § 1983):** CCSO/DA custom of retaliation via arrest, tow,
8 and prosecutorial ratification ("we want it gone," Exhibit C, 01:01:33.500; "my bosses,"
9 Exhibit E, 0:01:20; *Monell*).
- 10 • **State Law Claims:** False imprisonment (NRS 200.460), oppression under color of law
11 (NRS 197.200), intentional interference with prospective economic advantage (28 U.S.C.
12 § 1367).
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17 **Summary Judgment Purpose (Fed. R. Civ. P. 56)**

18 Exhibit I's charges (Bates EX019–EX021) criminalize **filming**, contradicted by video evidence
19 (Exhibits C, D) showing no pre-arrest warning or lawful basis, and reinforced by retaliatory
20 threats (Exhibit E). The **inconsistent charges** (NRS 203.010 omitted vs. Exhibit F; NRS 197.190
21 shifted to NRS 199.280) and rapid DA ratification suggest pretext, violating clearly established
22 law. These undisputed facts leave **no genuine dispute of material fact**—no reasonable jury
23 could find this prosecution justified—entitling Plaintiff to judgment as a matter of law.
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Qualified Immunity Defeat

Defendants' actions contravene clearly established rights under *Pearson v. Callahan*, 555 U.S. 223 (2009):

- **Violation:** Recording retaliation (*Fordyce, Glik, Irizarry, Nieves, Umbehr*), malicious prosecution (*Thompson*), due process (*Mathews, Parratt*), late Miranda (*Miranda*).
- **Clearly Established:** Rights defined pre-2022 (*Fordyce* 1995, *Thompson* 2022).

Prosecution shows **objective unreasonableness** (*Kingsley v. Hendrickson*, 576 U.S. 389 (2015)), not mere negligence. "Security risk" defenses fail against *Soldal's* warrant requirement, *Mathews's* notice mandate, and *Nieves's* retaliation bar (*Harlow v. Fitzgerald*, 457 U.S. 800 (1982)).

Authentication

Per Fed. R. Evid. 901, I, Drew J. Ribar, declare under penalty of perjury this Criminal Complaint (Bates EX019–EX021) was obtained via discovery in Case No. 22 CR 01231 1C and accurately reflects Defendants' prosecutorial actions on August 31, 2022.

Dated: March 27, 2025

/s/ **Drew J. Ribar**

Drew J. Ribar

3480 Pershing Ln, Washoe Valley, NV 89704

1 Tel: (775) 223-7899

2 Email: Const2Audit@gmail.com

28 PLEADING TITLE - 6

Office of the District Attorney
Carson City, Nevada
885 East Musser Street, Suite 2030, Carson City, NV 89701
Tel. (775) 887-2072 Fax (775) 887-2129

Carson City District Attorney's Office
JASON D. WOODBURY
DISTRICT ATTORNEY
TYSON DARIN LEAGUE
Supervising Deputy District Attorney
Nevada Bar No.: 13366
tleague@carson.org
885 East Musser Street, Suite 2030
Carson City, NV 89701
Telephone (775) 887-2072
Facsimile (775) 887-2129
Representing State of Nevada

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IN THE CARSON CITY JUSTICE COURT
IN AND FOR CARSON CITY, STATE OF NEVADA

STATE OF NEVADA,

Plaintiff,

v.

DREW J RIBAR,

Defendant.

Case No. 22 CR 01231 1C

Dept. No. I

CRIMINAL COMPLAINT

Tyson Darin League, Supervising Deputy District Attorney for Carson City, Nevada, complains and declares, upon information, belief and/or personal knowledge, that DREW J RIBAR, the Defendant, above-named, at Carson Township, in Carson City, State of Nevada, has committed the crime(s) of: TRESPASS, NOT AMOUNTING TO BURGLARY, a violation of NRS 207.200, a Misdemeanor and RESIST PUBLIC OFFICER, a violation of NRS 199.280(3), a Misdemeanor, in the manner following:

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EXD 22

Count I**TRESPASS, NOT AMOUNTING TO BURGLARY
(MISDEMEANOR - NRS 207.200)**

That the Defendant, Drew J Ribar, on or about August 30, 2022, at Carson Township, in Carson City, State of Nevada, did willfully remain on property after being told to leave by the lawful owner or occupant of such property or their designated representative, to wit: the Defendant refused to leave Nevada State Department of Corrections grounds after being told to leave by a Sergeant, a Lieutenant and the Warden himself, instead remaining on the property and filming security measures, all of which occurred at or near Northern Nevada Correctional Center, in Carson City, State of Nevada.

Count II**RESIST PUBLIC OFFICER
(MISDEMEANOR - NRS 199.280(3))**

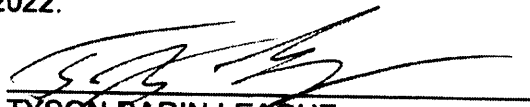
That the Defendant, Drew J Ribar, on or about August 30, 2022, at Carson Township, in Carson City, State of Nevada, did willfully and unlawfully resist, delay, or obstruct a public officer in discharging or attempting to discharge any legal duty of his or her office, to-wit: the Defendant refused to discontinue filming security measures at the Northern Nevada Correctional Center, and/or refused to leave the premises which resulted in a full facility lockdown hindering or obstructing the Corrections officials duties to maintain the security of the facility and/or their duty to secure inmates in the facility, all of which occurred at or near 1721 Snyder Avenue, Carson City, State of Nevada.

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1 All of which is contrary to the form of the Statutes in such cases made and
2 provided and against the peace and dignity of the State of Nevada. Said Complainant
3 declares under penalty of perjury under the law of the State of Nevada that the
4 foregoing is true and correct and prays that the Defendant may be dealt with according
5 to law.

6 DATED this 31st day of August, 2022.

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8 **TYSON DARIN LEAGUE**
9 Supervising Deputy District Attorney
10 Nevada Bar No. 13366

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Office of the District Attorney
Carson City, Nevada
885 East Musser Street, Suite 2030, Carson City, NV 89701
Tel: (775) 887-2072 Fax: (775) 887-2129

EX 024